

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE WAVE STUDIO, LLC,

Plaintiff,
v.
GENERAL HOTEL MANAGEMENT LTD.,
ABOUT, INC., AGIP LLC, AGODA
COMPANY PTE. LTD., AIR CANADA,
ALLIANCE RESERVATION NETWORK,
AMERICAN AIRLINES, INC., AMERICAN
EXPRESS COMPANY, AOL INC.,
BOOKING.COM BV, BOOKING HOLDINGS
INC., BOOKING.COM USA INC.,
BOOKIT.COM, INC., BRITISH AIRWAYS
PLC, CATHAY PACIFIC AIRWAYS LTD.,
CHARLES KESSLER & ASSOCIATES, INC.,
CITIBANK N.A., DELTA AIRLINES, INC.,
DESPEGAR.COM CORP., DESPEGAR.COM
USA, INC., EMERGING TRAVEL, INC.,
RATE HAWK, ZEN HOTELS, EXPEDIA,
INC., FAREBUZZ, FAREPORTAL, INC.,
FROMMER MEDIA LLC, FROSCH
INTERNATIONAL TRAVEL, INC.,
GETAROOM.COM, GOGOBOT, INC.,
GROUPON, INC., HOTELS COMBINED LLC,
HOTELS.COM GP LLC, HOTELSBYME,
JETBLUE AIRWAYS CORPORATION, JOE
MAZZARELLA, KAYAK SOFTWARE
CORPORATION, LEXYL TRAVEL
TECHNOLOGIES, LONELY PLANET
GLOBAL, INC., MAKEMYTRIP.COM, INC.,
METRO TRAVEL GUIDE, MOMONDO A/S,
NETADVANTAGE.COM, ORBITZ
WORLDWIDE, LLC, PEGASUS SOLUTIONS,
INC., PRICELINE.COM LLC, QATAR
AIRWAYS Q.C.S.C., RANDOM HOUSE,
RESERVATION COUNTER, ROCKET
TRAVEL, INC., SETAI OWNERS LLC,
SIGNATURE TRAVEL NETWORK,
SKYSCANNER LTD., SOUTHWEST
AIRLINES CO., SWISS INTERNATIONAL
AIR LINES LTD, TABLET INC., THIS LLC,
TRAVELOCITY.COM LP, TRAVELZOO

No. 7:13-cv-09239-CS-PED

**DECLARATION OF MENG ZHONG
TO LOCAL RULE 1.3(c)**

INC., TRAVIX TRAVEL USA INC.,
TRIPADVISOR LLC, TRIP.COM GROUP
LIMITED, TRIP.COM TRAVEL SINGAPORE
PTE. LTD., TRIVAGO N.V., TRIVAGO
SERVICES US, LLC, UNITED AIRLINES,
INC., UNITED AIRLINES, INC.,
SUCCESSOR-IN-INTEREST TO
CONTINENTAL AIRLINES, INC.,
VACATIONS BY TZELL, VFMLEONARDO,
INC., VISA, INC.,

Defendants.

DECLARATION OF MENG ZHONG TO LOCAL RULE 1.3(c)

1. I am a partner of the law firm of Lewis Roca Rothgerber Christie LLP, counsel for Visa, Inc. in the above-captioned action. I submit this declaration in support of my application for admission *pro hac vice*.

2. I am a member in good standing of the bars of the state of Nevada, and California. I have also been admitted to practice in the United States District Court for the Northern and Central Districts of California. I have remained in good standing in all these jurisdictions since the dates of my admission. Attached hereto as Exhibit 1 is a true and correct copy of my Certificate of Good Standing from each of the states in which I am a member of the bar.

3. I have never been convicted of a felony; I have never been censured, suspended, disbarred, or denied admission or readmission by any court; and there are no disciplinary proceedings pending against me in any state or federal court or state bar.

4. My contact information is:

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on September 9, 2024, in Las Vegas, NV.

Dated: September 9, 2024.

Respectfully submitted.

LEWIS ROCA
ROTHGERBER CHRISTIE LLP

/s/ Meng Zhong
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